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Attorneys for Plaintiff
CHRISTOPHER WADSWORTH, M.D.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHRISTOPHER S. WADSWORTH, M.D.,

Plaintiff,

v.

JEFFREY BEARD; J. CLARK KELSO;
TIMOTHY BELAVICH; RACHEL CHEN;
COURTNEY CORRADO; EUREKA DAYE;
ANDREW DEEMS; ERIC MONTHEI; CHERA
VAN BURG; LAURA WHYTE; and DOES 1
through 50, inclusive,

Defendants.

Case No. 3:15-cv-02322-EMC

**STIPULATION TO EXTEND TIME TO
RESPOND AND ALLOW FILING OF
SECOND AMENDED COMPLAINT**

[Civil Local Rule 6-1(a)]

Date Action Filed: 5/22/2015

First Amended Complaint Filed: 6/3/2015

Pursuant to Local Rule 6-1(a), Plaintiff Christopher Wadsworth and Defendants Jeffrey Beard, Rachel Chen, Courtney Corrado, Chera Van Burg, Laura Whyte, and J. Clark Kelso (collectively referred to as "Stipulating Defendants"), through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, the current deadline for at least some of the Stipulating Defendants to respond to the First Amended Complaint is November 4, 2015;

WHEREAS, Rukin Hyland Doria & Tindall LLP substituted into this case on October 30,

STIPULATION TO EXTEND TIME TO RESPOND AND ALLOW FILING OF SECOND AMENDED
COMPLAINT

Case No.: 3:15-cv-02322-EMC

2015 as counsel of record for Plaintiff Wadsworth and intend to file on Plaintiff's behalf a second amended complaint;

WHEREAS, Rukin Hyland Doria & Tindall LLP require sufficient time to meet and confer with Stipulating Defendants' counsel and to prepare an amended complaint given the voluminous facts and currently pled causes of action in the operative complaint;

WHEREAS, Plaintiff intends to file the second amended complaint prior to the Case Management Conference currently scheduled for December 10, 2015, and therefore the extension of time for Plaintiff to file a second amended complaint will not unduly affect or interfere with any conferences or hearings scheduled currently on calendar in this matter;

WHEREAS, it is Plaintiff's and the Stipulating Defendants' understanding that the remaining Defendants have not yet secured counsel but will not be prejudiced by this stipulation;

WHEREAS, the parties execute this stipulation upon mutual agreement, in good faith, and not for the purpose of causing unwarranted delay; and

WHEREAS, the parties have not previously stipulated for an extension of time for Plaintiff to file an amended complaint;

The parties now stipulate that (1) Plaintiff shall file his second amended complaint on or before December 7, 2015, and (2) the Stipulating Defendants shall file their respective responsive pleadings thereto not later than January 11, 2015 and, by entering into this stipulation, shall not be deemed to have waived any defenses they have to the second amended complaint.

IT IS SO STIPULATED.

Dated: November 4, 2015

RUKIN HYLAND DORIA & TINDALL LLP

By: /s/ Jessica Riggin

Jessica Riggin
John F. Hyland

Counsel for Plaintiff Christopher Wadsworth, M.D.

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2 Dated: November 3, 2015

OFFICE OF THE ATTORNEY GENERAL

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4 By: 

Lyn Harlan

5 Counsel for Jeffrey Beard, Rachel Chen, Courtney
6 Corrado, Chera Van Burg, and Laura Whyte

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8 Dated: November __, 2015

FUTTERMAN DUPREE DODD CROLEY MAIER
LLP

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10 By: _____

Martin Dodd

11 Counsel for J. Clark Kelso
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OFFICE OF THE ATTORNEY GENERAL

Dated: November __, 2015

By: _____

Lyn Harlan

Counsel for Jeffrey Beard, Rachel Chen, Courtney
Corrado, Chera Van Burg, and Laura Whyte

Dated: November 3, 2015

FUTTERMAN DUPREE DODD CROLEY MAIER
LLP

By: _____

Martin Dodd

Counsel for J. Clark Kelso

IT IS SO ORDERED:

Edward M. Chen
U.S. District Judge

